



FILED
U.S. DISTRICT COURT
NORTHERN DIST. OF TX
FT. WORTH DIVISION

2012 APR 25 AM 10:00

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

MANSFIELD HELIFLIGHT, INC.)
Plaintiff,)

vs.)

) Civil Action Number: 4-12-CV-203-A

GRIZZLY HELO LEASING, LLC.)
BELL HELICOPTER TEXTRON)
INC. and UNITED STATES AVIATION)
UNDERWRITERS, INC.)
Defendants)

**BELL HELICOPTER TEXTRON INC.'S
MOTION TO DISMISS PURSUANT TO RULE 12(b)(6)**

Pursuant to Federal Rule of Civil Procedure 12(b)(6), Bell Helicopter Textron Inc. (hereinafter "Bell"), one of the Defendants herein, respectively moves the Court for an order dismissing three causes of action asserted in Plaintiff's Original Petition. The grounds for this motion to dismiss are as follows:

1. The alleged fraud complained of occurred after the transaction in question.
2. The alleged fraud by non-disclosure complained of occurred after the transaction in question.
3. Conspiracy is improper because Mansfield's pleading fails to state claims for fraud and fraud by non-disclosure upon which relief may be granted.

4. This motion is based upon the accompanying Memorandum in Support of Bell Helicopter Textron Inc.'s Motion to Dismiss Pursuant to Rule 12(b)(6).

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'J. Frank Kinsel, Jr.', is written over a horizontal line.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was served on the individual listed below in the following manner on this the 25th day of April, 2012:

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